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Federal Communications Commission
Office of the Secretary

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*NOT ADMITTED TO FLORIDA BAR

September 21, 1990

SEP 25 11 41 AM '90
AUDIO SERVICES DIV.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Benchmark Communications Corporation
NEW FM, Chatom, Alabama
Amendment to File No. BPH-891228MT
Our File No. 17011

Dear Ms. Searcy:

On behalf of Benchmark Communications Corporation, enclosed please find an original and two copies of a minor amendment to the above-referenced application for a new FM station at Chatom, Alabama.

As discussed in Exhibit #4, this amendment entails processing under **Rule 73.215** with respect to File No. BPH-891205MJ at Atmore, Alabama.

If there are any questions about this amendment, please communicate with the undersigned.

Respectfully submitted,

John M. Spencer
Counsel for
Benchmark Communications Corporation

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SEP 25 1990
FM EXAMINERS

JMS:hs

Encl (3)

Federal Communications Commission
Washington, D. C. 20554

FCC 301

Approved by OMB
3060-0027
Expires 2/28/92
See Page 25 for information regarding public burden estimate

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

For COMMISSION Fee Use Only	FEE NO:	For APPLICANT Fee Use Only Is a fee submitted with this application? ☐ Yes ☐ No
	FEE TYPE:	If fee exempt (see 47 C.F.R. Section 1.1112), indicate reason therefor (check one box): ☐ Noncommercial educational licensee ☐ Governmental entity
	FEE AMT:	
	ID SEQ:	FOR COMMISSION USE ONLY FILE NO.

Section I - GENERAL INFORMATION

1. Name of Applicant

RECEIVED
SEP 24 1990
Federal Communications Commission
Office of the Secretary

Benchmark Communications Corp.

Street Address or P.O. Box
4700 S.W. 75th Avenue

City	State	ZIP Code
Miami	FL	33155

Telephone No. (Include Area Code)
(305) 264-5957

Send notices and communications to the following person at the address below:

Name
John M. Spencer
Leibowitz & Spencer

Street Address or P.O. Box
One S.E. Third Avenue #1450

City	State	ZIP Code
Miami	FL	33131

Telephone No. (Include Area Code)
(305) 530-1322

2. This application is for: ☐ AM ☒ FM ☐ TV

(a) Channel No. or Frequency	(b) Principal Community	City	State
291C3		Chatom	AL

(c) Check one of the following boxes:

☐ Application for **NEW** station

☐ **MAJOR** change in licensed facilities; call sign: _____

☐ **MINOR** change in licensed facilities; call sign: _____

☐ **MAJOR** modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ **MINOR** modification of construction permit; call sign: _____

File No. of construction permit: _____

☒ Minor **AMENDMENT** to pending application; Application file number: BPH-891228MT

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No

If Yes, state:

Call letters	Community of License	
	City	State

SECTION VII – CERTIFICATION (Page 5)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant	Signature
Benchmark Communications Corp.	
Date	Title
September 21, 1990	President

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 71 hours 45 minutes to 301 hours 80 minutes with an average of 118 hours 28 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Office of Managing Director, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0027), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

Section V-B - FM BROADCAST ENGINEERING DATA	FOR COMMISSION USE ONLY File No. _____ ASB Referral Date _____ Referred by _____

Name of Applicant

Benchmark Communications Corp.

Call letters *(if issued)*	Is this application being filed in response to a window? ☐ Yes ☒ No
WCCJ	If Yes, specify closing date: _____

Purpose of Application: *(check appropriate box(es))* AMEND BPH-891228MT

- ☐ Construct a new (main) facility
- ☐ Construct a new auxiliary facility
- ☐ Modify existing construction permit for main facility
- ☐ Modify existing construction permit for auxiliary facility
- ☐ Modify licensed main facility
- ☐ Modify licensed auxiliary facility

If purpose is to modify, indicate below the nature of change(s) and specify the file number(s) of the authorizations affected.

- ☒ Antenna supporting-structure height
- ☐ Effective radiated power
- ☐ Antenna height above average terrain
- ☐ Frequency
- ☐ Antenna location
- ☐ Class
- ☐ Main Studio location
- ☒ Other *(Summarize briefly)* Install directional antenna

File Number(s) AMEND BPH-891228MT

1. Allocation:

Channel No.	Principal community to be served:		
	City	County	State
291	Chatom	Washington	AL

Class *(check only one box below)*

☐ A ☐ B1 ☐ B ☒ C3
☐ C2 ☐ C1 ☐ C

2. Exact location of antenna.

(a) Specify address, city, county and state. If no address, specify distance and bearing relative to the nearest town or landmark.

1.6 kilometers northwest of St. Stephens, Washington County, Alabama.

(b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	31°	33'	03"	Longitude	88°	03'	55"

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ☐ Yes ☒ No

If Yes, give call letter(s) or file number(s) or both. N/A

If proposal involves a change in height of an existing structure, specify existing height above ground level including antenna, all other appurtenances, and lighting, if any.

N/A

SECTION V-B – FM BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates? ☐ Yes ☒ No
If Yes, list old coordinates.

Latitude ° ' "	Longitude ° ' "

5. Has the FAA been notified of the proposed construction? Tower less than 200 feet. ☐ Yes ☒ No
If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Exhibit No. N/A

Date _____ Office where filed _____

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
(a)	NONE		
(b)			

7. (a) Elevation: *(to the nearest meter)*

(1) of site above mean sea level: Determined by local survey — 87 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and — 50 meters

(3) of the top of supporting structure above mean sea level [(a)(1) + (a)(2)] — 137 meters

(b) Height of radiation center: *(to the nearest meter)* H = Horizontal; V = Vertical

(1) above ground — 40 meters (H)

40 meters (V)

(2) above mean sea level [(a)(1) + (b)(1)] — 127 meters (H)

127 meters (V)

(3) above average terrain — 100 meters (H)

100 meters (V)

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of FM radiator.

Exhibit No. 1

9. Effective Radiated Power:
(a) ERP in the horizontal plane — 25 kw (H*) 25 kw (V*)

(b) Is beam tilt proposed? ☐ Yes ☒ No

If Yes, specify maximum ERP in the plane of the tilted beam, and attach as an Exhibit a vertical elevational plot of radiated field.

Exhibit No. N/A

_____ kw (H*) _____ kw (V*)

*Polarization

10. Is a directional antenna proposed? [X] Yes [ ] No

If Yes, attach as an Exhibit a statement with all data specified in 47 C.F.R. Section 73.316, including plot(s) and tabulations of the relative field. Exhibit No. 2

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.315(a) and (b)? [ ] Yes [X] No

If No, attach as an Exhibit a request for waiver and justification therefor, including amounts and percentages of population and area that will not receive 3.16 mV/m service. Exhibit No. 3

12. Will the main studio be within the protected 3.16 mV/m field strength contour of this proposal? [X] Yes [ ] No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125. Exhibit No. N/A

13. (a) Does the proposed facility satisfy the requirements of 47 C.F.R. Section 73.207? [ ] Yes [X] No

(b) If the answer to (a) is No, does 47 C.F.R. Section 73.213 apply? [ ] Yes [X] No

(c) If the answer to (b) is Yes, attach as an Exhibit a justification, including a summary of previous waivers. Exhibit No. N/A

(d) If the answer to (a) is No and the answer to (b) is No, attach as an Exhibit a statement describing the short spacing(s) and how it or they arose. Exhibit No. 4

(e) If authorization pursuant to 47 C.F.R. Section 73.215 is requested, attach as an Exhibit a complete engineering study to establish the lack of prohibited overlap of contours involving affected stations. The engineering study must include the following: Exhibit No. 4

(1) Protected and interfering contours, in all directions (360°), for the proposed operation.
(2) Protected and interfering contours, over pertinent arcs, of all short-spaced assignments, applications and allotments, including a plot showing each transmitter location, with identifying call letters or file numbers, and indication of whether facility is operating or proposed. For vacant allotments, use the reference coordinates as the transmitter location.
(3) When necessary to show more detail, an additional allocation study utilizing a map with a larger scale to clearly show prohibited overlap will not occur.
(4) A scale of kilometers and properly labeled longitude and latitude lines, shown across the entire exhibit(s). Sufficient lines should be shown so that the location of the sites may be verified.
(5) The official title(s) of the map(s) used in the exhibits(s).

14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters, or any nonbroadcast *(except citizens band or amateur)* radio stations; or (b) within the blanketing contour, any established commercial or government receiving stations, cable head-end facilities, or populated areas; or (c) within ten (10) kilometers of the proposed antenna, any proposed or authorized FM or TV transmitters which may produce receiver-induced intermodulation interference? [X] Yes [ ] No

If Yes, attach as an Exhibit a description of any expected, undesired effects of operations and remedial steps to be pursued if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference (including that caused by receiver-induced or other types of modulation) to facilities in existence or authorized or to radio receivers in use prior to grant of this application. *(See 47 C.F.R. Sections 73.315(b), 73.316(e) and 73.318.)* Exhibit No. 5

15. Attach as an Exhibit a 7.5 minute series U.S. Geological Survey topographic quadrangle map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the requirements set forth in Instruction V. The map must further clearly and legibly display the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No. 6

16. Attach as an Exhibit *(name the source)* a map which shows clearly, legibly, and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. 7

(a) the proposed transmitter location, and the radials along which profile graphs have been prepared;

(b) the 3.16 mV/m and 1 mV/m predicted contours; and

(c) the legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 2.59 sq. km.) and population (latest census) within the predicted 1 mV/m contour.

Area 3969.0 sq. km. Population 32,567

18. For an application involving an auxiliary facility only, attach as an Exhibit a map *(Sectional Aeronautical Chart or equivalent)* that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No. N/A

(a) the proposed auxiliary 1 mV/m contour; and

(b) the 1 mV/m contour of the licensed main facility for which the applied-for facility will be auxiliary. Also specify the file number of the license.

19. Terrain and coverage data *(to be calculated in accordance with 47 C.F.R. Section 73.313)*

Source of terrain data: *(check only one box below)*

[X] Linearly interpolated 30-second database [ ] 7.5 minute topographic map

(Source: NGDC)

[ ] Other *(briefly summarize)*

SECTION V-B – FM BROADCAST ENGINEERING DATA (Page 5)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances	
		To the 3.16 mV/m contour (kilometers)	To the 1 mV/m contour (kilometers)
* 241.6	91.8	22.5	37.0
0	119.7	22.9	37.4
45	93.6	22.3	36.6
90	94.4	21.7	35.7
135	96.9	19.8	33.0
180	97.4	19.6	32.6
225	96.6	22.8	37.3
270	96.2	22.5	36.8
315	105.0	20.9	34.5

*Radial through principal community, if not one of the major radials. This radial should NOT be included in the calculation of HAAT.

20. Environmental Statement *(See 47 C.F.R. Section 1.1301 et seq.)*

Would a Commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact? ☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by Section 1.1311. Exhibit No. N/A

If No, explain briefly why not. This application is categorically excluded from environmental processing under the provisions of §1.1306 of the Commission's Rules. See Exhibit #8 for Radiofrequency Radiation Statement.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name *(Typed or Printed)*	Relationship to Applicant *(e.g., Consulting Engineer)*
Jefferson G. Brock Bromo Communications, Inc.	Technical Consultant
Signature	Address *(Include ZIP Code)* 1200 Eighteenth Street, N.W. Suite 206 Washington, D.C. 20036
Date September 19, 1990	Telephone No. *(Include Area Code)* (202) 429-0600

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Technical Exhibit
TE-1

Bromo Communications, Inc.
1200 Eighteenth Street, NW - Suite #206
Washington, DC 20036
(202) 429-0600

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Technical Statement

This application and associated exhibits support the request of Benchmark Communications Corp. ("Benchmark"), to amend its pending application, file # BPH-891228MT, which is seeking authority to construct a new main FM transmitter site for WCCJ, Chatom, Alabama. Benchmark is amending its application in order to specify the use of a directional FM antenna system in order to protect the lone applicant for Channel 290A at Atmore, Alabama, Alabama Native American Broadcasting Company ("ANABC"). Benchmark's proposed site is shortspaced to this application by less than eight kilometers, based on §73.213(c)(1) regulations, since the allocation of Channel 291C3 to Chatom, Alabama and Channel 290A at Atmore, Alabama were proposed prior to October 2, 1989.

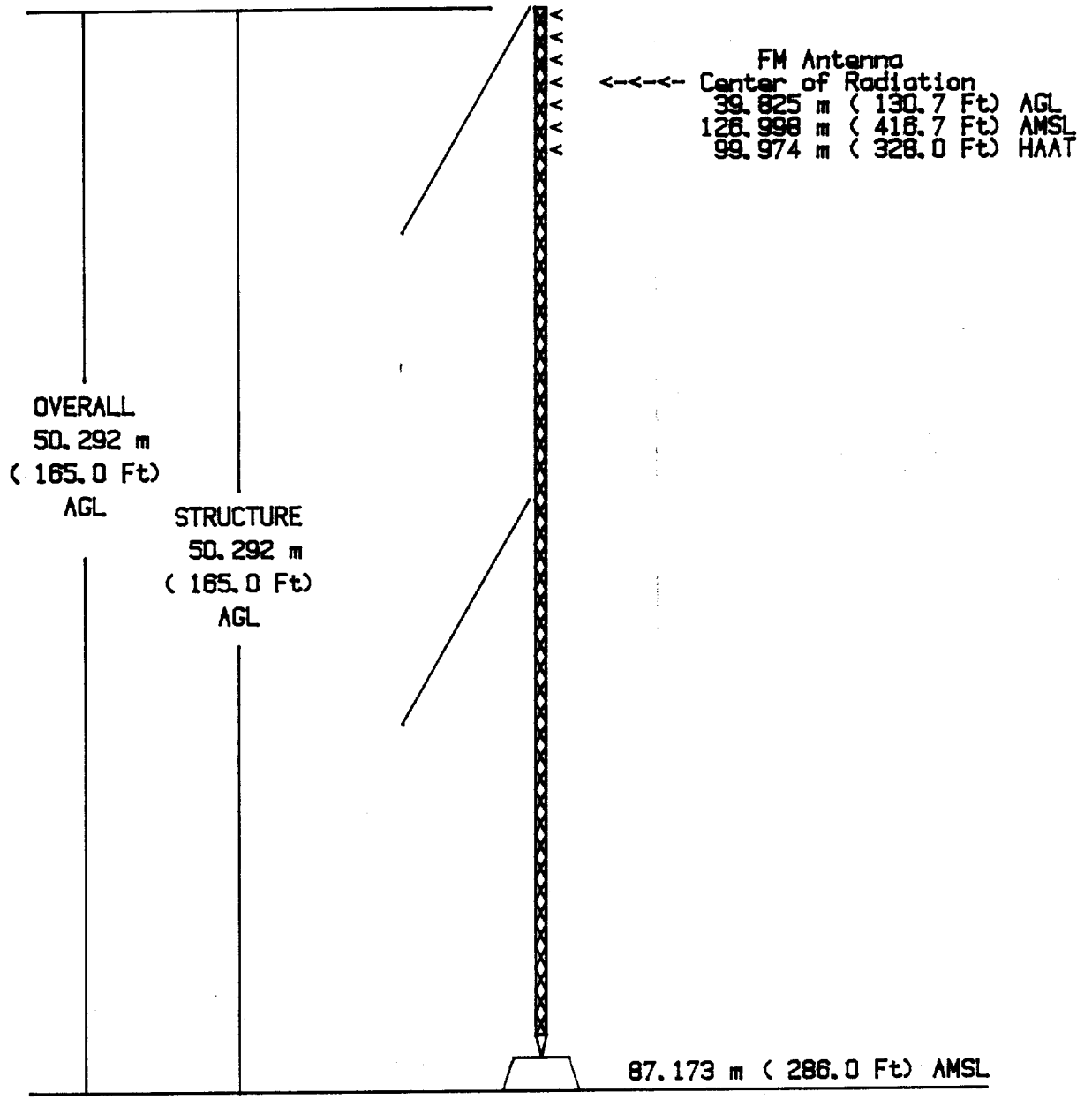
Benchmark will utilize a directional antenna to preclude prohibited overlap of contours under the provisions of §73.215 of the Commission's regulations. Additionally, Benchmark revises the proposed height of its antenna supporting structure, to accommodate its proposed FM antenna system. Since the proposed tower height is less than 60.96 meters (200 feet) above the ground and is more than 20,000

feet from any airport runway, the FAA was not notified of this proposal. This is in accordance with §77.13 of FAA regulations and §17.7 of the Commission's regulations.

Benchmark notes that §73.215 regulations were enacted prior to the First Report and Order in MM Docket # 88-375, which created Class C3 stations and therefore Class C3 stations were not included in the Report and Order which authorized §73.215 regulations. Benchmark respectfully requests a waiver of §73.215 regulations for the inclusion of Class C3 facilities and requests that this application be processed under the interference protection requirements, applicable to first adjacent channel stations, contained in §73.215 regulations. The shortage to the application at Atmore, Alabama is less than 8 kilometers. Benchmark will utilize the interference provisions contained in §73.215 regulations to demonstrate and insure that the protected and interfering contours of WCCJ, 60 dBu (50/50) and 54 dBu (50/10) respectively, do not overlap the protected and interfering contours of ANABC's application, also the 60 dBu (50/50) and 54 dBu (50/10) respectively. It should be noted that ANABC's application at Atmore also requested processing under §73.215 regulations. Benchmark's proposal protects the contours proposed in ANABC's application, file # BPH-891205MJ.

All required data regarding the directional antenna system is contained in this amendment as Exhibit # 2. The engineering studies required for processing under §73.215 regulations are attached as Exhibit # 4. There are two other applications for Channel 291C3 at Chatom, Alabama.

However, both were filed well after the window for filing had closed at Chatom and are not considered in this application. For the staff's convenience, all other exhibits, including an original site map, are being updated and resubmitted.



LATITUDE 31-33-03 LONGITUDE 88-03-55 27.02 m (88.7 Ft) TERR AVG

VERTICAL PLAN SKETCH

SITE ELEVATION - 87 m AMSL
TOP OF STRUCTURE - 50 m AGL
137 m AMSL
FM Antenna COR - 40 m AGL
127 m AMSL
100 m HAAT

NOTE: NOT DRAWN TO SCALE

NOTE : SITE ELEVATION DETERMINED BY LOCAL SURVEY.

EXHIBIT #1

AMEND BPH-891228MT
BENCHMARK COMM. CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
SEPTEMBER 1990

BROMO COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Exhibit # 2

Directional Antenna System

Benchmark Communications Corp. ("Benchmark") is proposing to use a directional FM antenna system to achieve the required amount of protection to the lone applicant for Channel 290A, at Atmore, Alabama. See Exhibit # 4 for additional channel spacing clearance details.

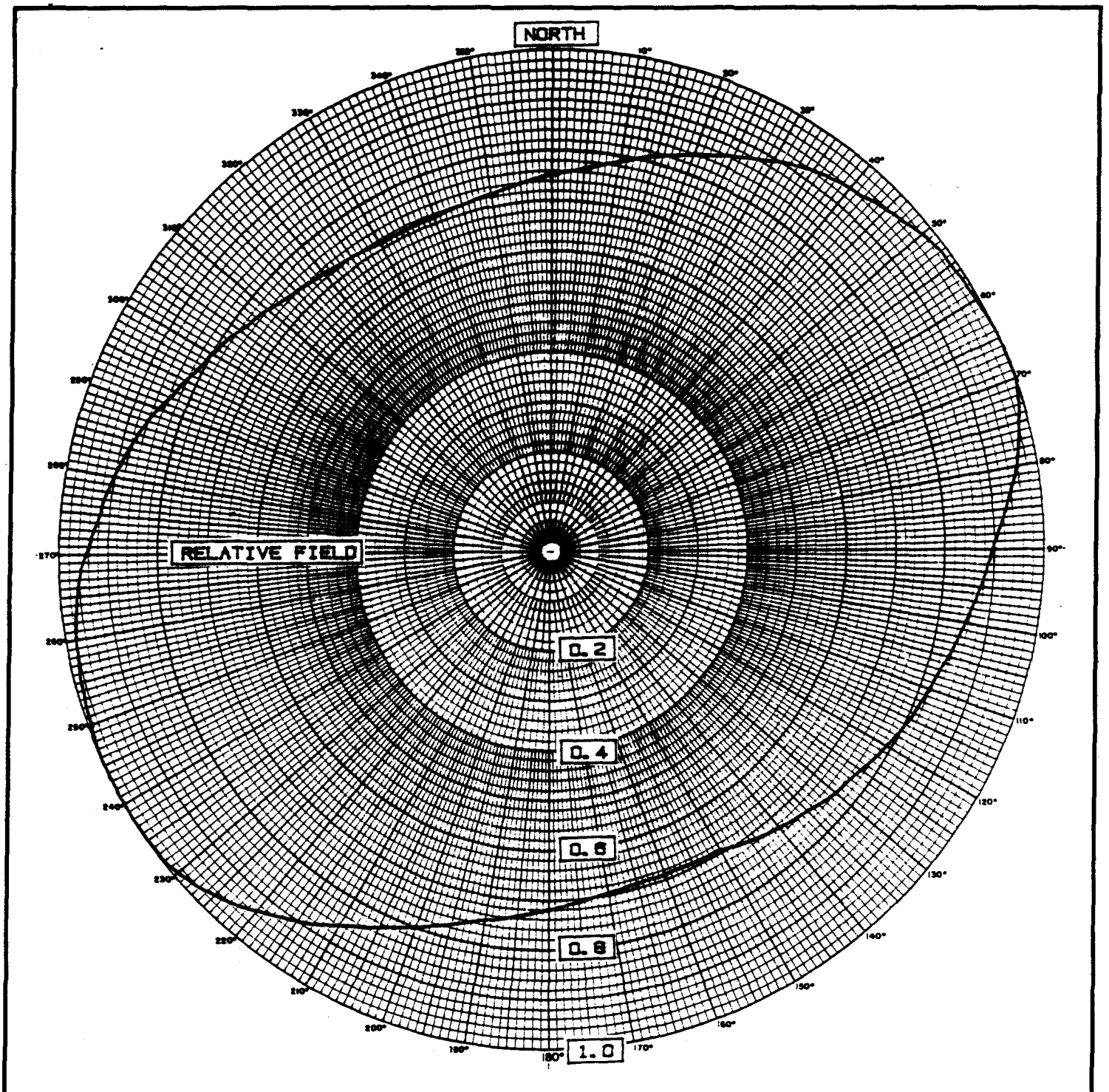
The proposed antenna is manufactured by Shively Labs, a division of Howell Laboratories. The antenna is a circularly polarized seven-bay radiator, Model #6810-7. The antenna will be mounted in accordance with the manufacturer's specifications. The proposed envelope pattern of the antenna system was developed from an actual measured pattern. This envelope pattern was used in the preparation of all WCCJ contours. The actual measured pattern, including tabulated relative field pattern, submitted with FCC Form 302, will come as close as possible to the envelope pattern submitted herein without exceeding the limits of the envelope pattern on any azimuth.

Exhibit # 2A is a horizontal plane relative field envelope pattern of the proposed system with the zero degree bearing oriented True north, in accordance with §73.316(c)(2).

Additionally, Exhibit # 2B is a tabulated relative field pattern of the proposed envelope pattern. Maxima and Minima are noted on the tabulation. This is a composite envelope pattern, containing both horizontal and vertical polarizations.

Exhibit # 2C demonstrates the typical vertical plane pattern of the proposed system. No other antennas or tower attachments, including top-mounted platforms, will be located near the directional antenna system. Any other antennas mounted on the tower will be placed far enough away from the directional radiator so as not to affect the directional pattern. The distance any other antenna must be mounted away from the directional system will be specified by the manufacturer.

When Benchmark files FCC Form 302, it will include a statement from a licensed surveyor that the antenna has been installed pursuant to the manufacturer's instructions and is in the proper orientation. As previously stated, the Form 302 application will be accompanied by the actual measured pattern and tabulated relative field pattern.



HORIZONTAL PLANE PATTERN

AN ACTUAL MEASURED PATTERN WILL BE SUBMITTED WITH THE LICENSE APPLICATION (FORM 302) AND WILL COME AS CLOSE AS POSSIBLE TO THIS ENVELOPE PATTERN WITHOUT EXCEEDING IT IN ANY DIRECTION.

EXHIBIT #2A
AMEND BPH-891228MT
BENCHMARK COMM. CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
SEPTEMBER 1990

BROMO COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Exhibit # 2B

Horizontal Plane Relative Field Envelope Pattern

Tabulated Data

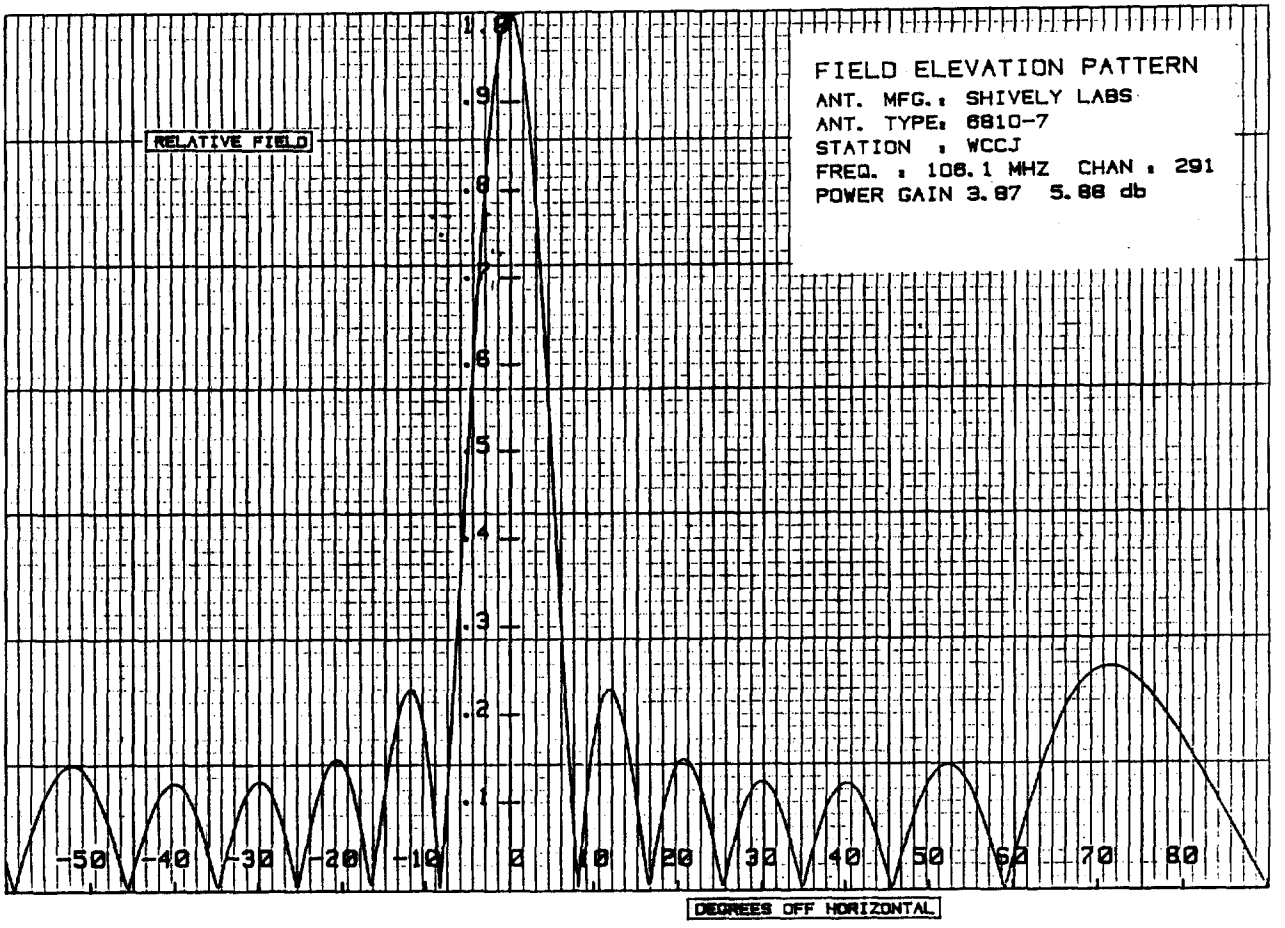
Degrees	Relative Field	Degrees	Relative Field
0	.750	180	.720
10	.790	190	.750
20	.840	200	.800
30	.895	210	.860
40	.940	220	.935
50	.980	230	.990
60	.995	* 240	1.000
* 70	1.000	250	.995
80	.960	260	.980
90	.900	270	.945
100	.855	280	.900
110	.820	290	.850
120	.790	300	.800
130	.760	310	.760
140	.730	320	.730
150	.695	+ 330	.715
+ 160	.690	340	.715
170	.695	350	.725

* Maxima Relative Field

+ Minima Relative Field

K+E KEUFFEL & ESSER CO.

46 0700



VERTICAL PLANE PATTERN

EXHIBIT #2C
AMEND BPH-891228MT
BENCHMARK COMM. CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
SEPTEMBER 1990

KROMO COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Exhibit # 3

Discussion of City Grade Coverage

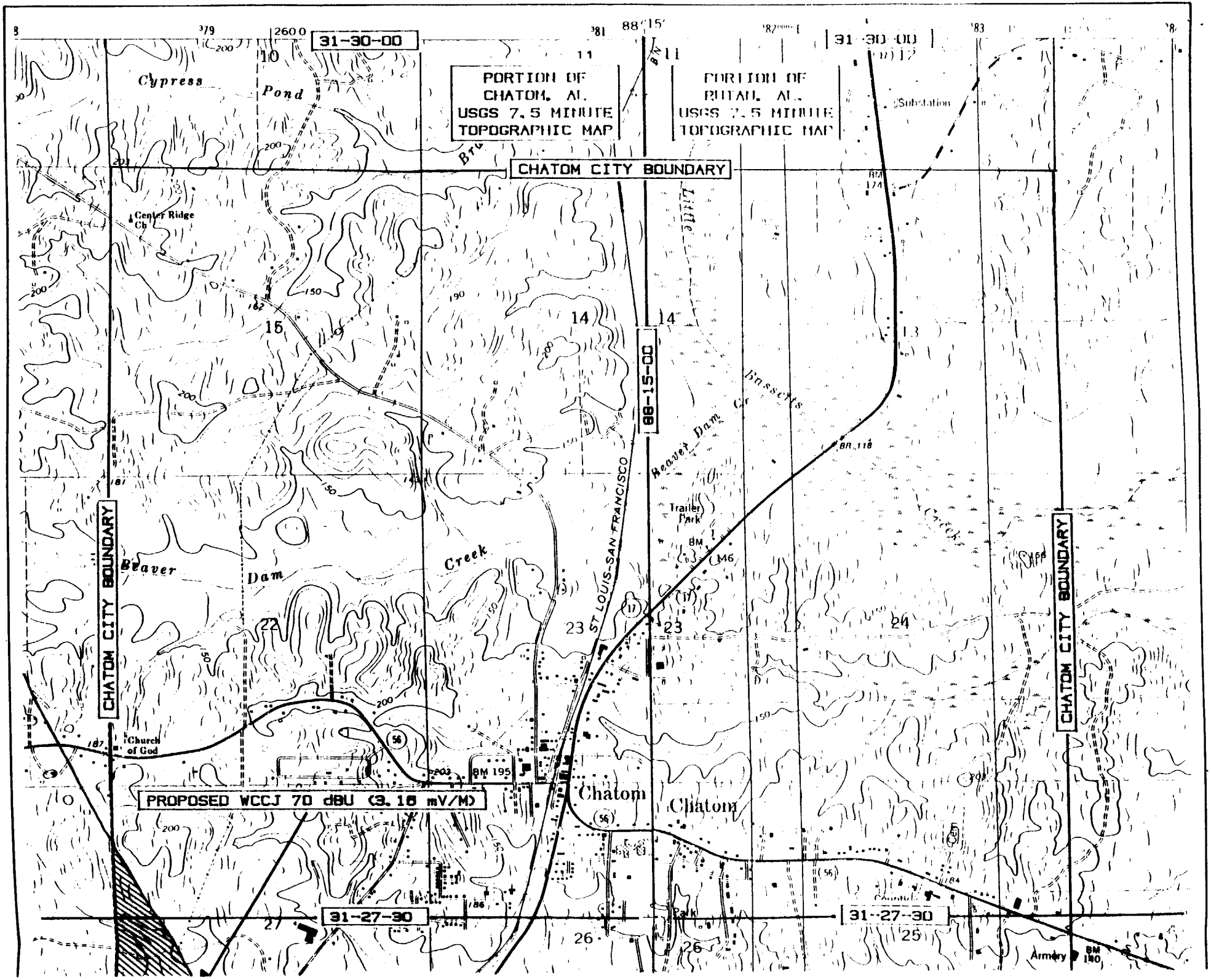
The proposed antenna site for WCCJ was selected by Benchmark due to the site availability, access and proximity to commercial power. Although WCCJ is proposing a directional antenna system, a full 25 kilowatts effective radiated power will be provided in the direction of Chatom, Alabama. Unfortunately, the intervening terrain between the WCCJ transmitter site and the city of Chatom is lower than the 100 meters height above average terrain of the facility. As a result, the 3.16 mV/m contour does not completely encompass 100% of the legal boundaries of the community.

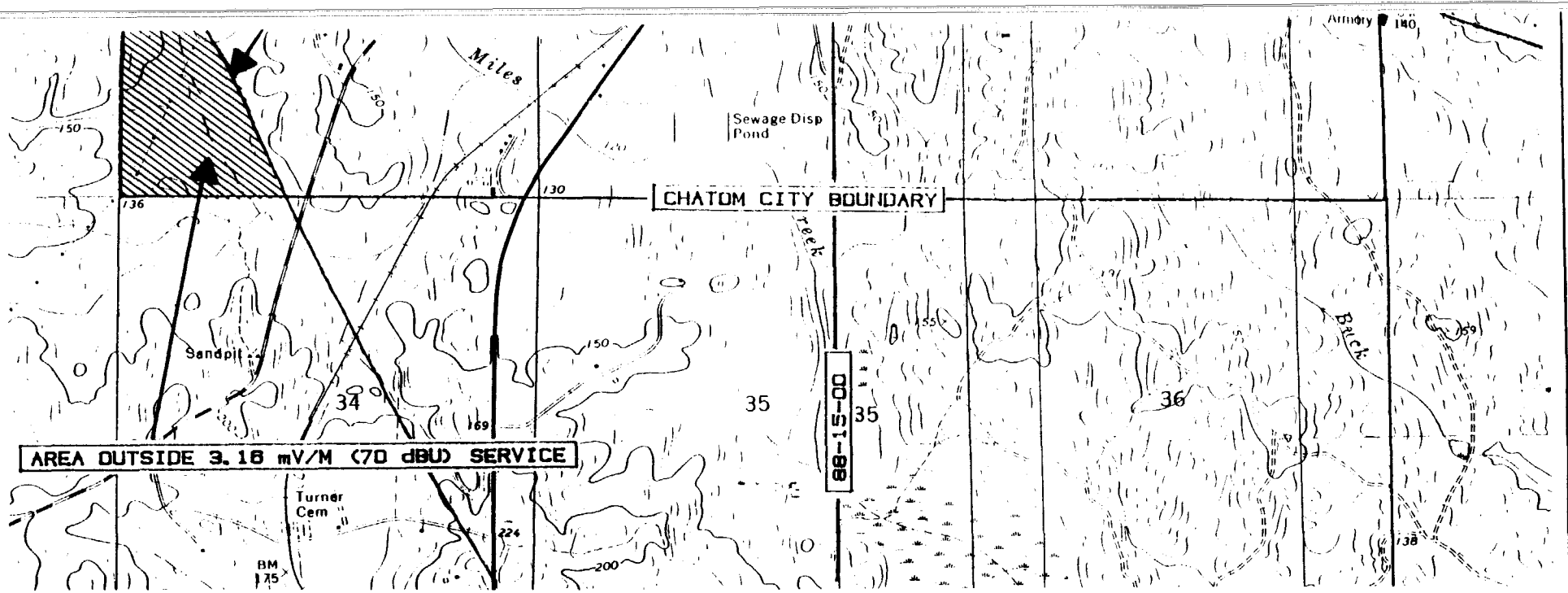
However, the legal boundaries of Chatom, Alabama encompass a great deal of agricultural and undisturbed natural areas. The area not covered with the 3.16 mV/m signal, as demonstrated on Exhibit # 3A, is made up of primarily this type of land, including a jeep trail and high power electrical transmission lines. There are no residences located within this area. Of the total land area of 24.67 square kilometers within the boundary of Chatom,

all but 0.43 square kilometers of land area is encompassed by the city grade signal. However, 100% of the population of Chatom, 1122 person, according to the 1980 U.S. Census, will receive 3.16 mV/m service from this proposal.

Therefore, since the facility is serving 100% of the population of Chatom and 98.3% of the legal boundaries, no waiver of §73.315 is required. See footnote below.1

1. No request for waiver is requested unless the proposed 3.16 mV/m coverage falls below 80% of the principal community, see John R. Hughes et al, 50 Fed. Reg. 5679 (1985).


PORTION OF CHATOM, AL. USGS 7.5 MINUTE TOPOGRAPHIC MAP
PORTION OF RUTAH, AL. USGS 7.5 MINUTE TOPOGRAPHIC MAP
31-30-00
31-30-00
CHATOM CITY BOUNDARY
CHATOM CITY BOUNDARY
CHATOM CITY BOUNDARY
88-15-00
31-27-30
31-27-30
PROPOSED WCCJ 70 dBU (3.16 mV/M)
Cypress Pond
Center Ridge Ch
Beaver Dam Creek
Little Bassetts Creek
ST LOUIS-SAN FRANCISCO
Trailer Park
Church of God
Chatom
Chatom
Substation
Armory
BM 195
BM 174
BM 140
BR 118
10
11
14
15
22
23
24
25
26
27



CITY GRADE COVERAGE DETAIL

EXHIBIT #3A

AMEND BPH-891228MT
BENCHMARK COMM. CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
SEPTEMBER 1990

SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

BROMO COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

AMEND BPH-891228MT
BENCHMARK COMMUNICATIONS CORP.
WCCJ-FM RADIO STATION
CH 291C3 - 106.1 MHZ - 25 KW
CHATOM, ALABAMA
September 1990

Exhibit # 4

Shortspaced Facilities Utilizing §73.215 Regulations

The WCCJ proposed antenna location will be shortspaced to the lone applicant for Channel 290A at Atmore, Alabama. Since the proposals which allotted Channel 291C3 to Chatom, Alabama and Channel 290A to Atmore, Alabama were started prior to October 2, 1989, the required spacing distances, as shown on the detailed clearance study, Exhibit # 4A, are based on §73.213(c)(1) spacing requirements. It should be noted that the Channel 291C3 allocation site at Chatom, Alabama is shortspaced to the Atmore application site by 5.09 kilometers under current §73.207 spacing requirements. Benchmark Communications Corp. requests processing under the contour protection provisions of §73.215. A request for a waiver, for the inclusion of Class C3 stations in §73.215 regulations, is detailed in the technical statement of this amendment.

Benchmark proposes to utilize a directional FM antenna system to alleviate the shortspace situation with the Atmore, Alabama Channel 290A application. The Atmore applicant is also utilizing §73.215 regulations and will therefore be afforded protection based on the contours depicted in its application, file # BPH-891205MJ. All

contour data relating to the Atmore application was taken directly from BPH-891205MJ. Exhibits # 4B and 4C visually demonstrate that there will be no prohibited overlap between the WCCJ contours and the Channel 290A application at Atmore, Alabama.

Using the contour data contained in Exhibits # 4D and 4E, which are the tabulated distances to the protected and interfering contours of WCCJ and the Channel 290A application at Atmore, Alabama, we show clearance between the proposals.

WCCJ's protected contour, on a bearing of 140.2° towards Atmore, extends 33.07 kilometers. The interfering contour of Atmore extends 31.96 kilometers towards WCCJ. The combination of these two distances equal 65.07 kilometers. Since the proposals are 78.48 kilometers apart, there is a clearance of 13.45 kilometers. Conversely, the WCCJ interfering contour extends 51.87 kilometers towards the Atmore protected contour, which, in turn, extends 22.33 kilometers out from the proposed Atmore transmitter site. The contours' distances when added together equal 74.20 kilometers, providing a buffer of more than 4.0 kilometers between the proposals.

Again, Exhibits # 4B and 4C demonstrate that there is no prohibited overlap between the proposals.

CLEARANCE STUDY FOR WCCJ CHATOM, ALABAMA
USING PROPOSED SITE AS REFERENCE

REFERENCE
31 33 03 N
88 03 55 W

CLASS C3
Previous rule spacings
CHANNEL 291 -106.1 MHz

DISPLAY DATES
DATA 90-08-30
SEARCH 09-14-90

	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN	
	WCCJ.A	291C3	Chatom	AL	0.0	0.00	153.0	-153.00	*
	AL291	291C3	Chatom	AL	293.1	6.05	153.0	-146.95	*
+	AP291	291C3	Chatom	AL	313.1	6.68	153.0	-146.32	*
+	AP291	291C3	Chatom	AL	245.3	22.52	153.0	-130.48	*
*	AP290	290A	Atmore	AL	140.2	78.48	84.0	-5.52	*
	AL290	290A	Atmore	AL	140.0	91.64	84.0	7.64	
	WABOFM	288A	Waynesboro	MS	283.9	59.70	42.0	17.70	
	DE288	288A	Waynesboro	MS	283.9	59.70	42.0	17.70	
	AL291	291A	Gulf Breeze	FL	146.7	158.16	138.0	20.16	
	AD288	288C3	Bay Minette	AL	172.4	64.29	43.0	21.29	
	AD238	238C3	Thomasville	AL	49.7	37.36	14.0	23.36	
	DE292	292A	Petal	MS	260.1	107.44	84.0	23.44	
	DE292	292A	Petal	MS	260.1	107.44	84.0	23.44	
	WMFM	292A	Petal	MS	260.1	107.44	84.0	23.44	
	WZNJ	292A	Demopolis	AL	12.5	108.04	84.0	24.04	
	WKYJ	291C2	Starkville	MS	343.9	201.16	177.0	24.16	
	AL291	291C2	Starkville	MS	343.7	202.05	177.0	25.05	
	WKNU	292A	Brewton	AL	116.1	110.55	84.0	26.55	
	AD238	238C3	Thomasville	AL	39.9	47.05	14.0	33.05	
	AL291	291C2	Picayune	MS	239.5	213.48	177.0	36.48	
	WJDBFM	237A	Thomasville	AL	39.5	47.71	11.0	36.71	
	DE237	237A	Thomasville	AL	39.5	47.71	11.0	36.71	
	DE237	237A	Thomasville	AL	39.5	47.71	11.0	36.71	
	AL293	293A	Bay Minette	AL	161.2	79.03	42.0	37.03	
	AL293	293C2	Demopolis	AL	24.2	95.99	56.0	39.99	

CLEARANCE STUDY

* NOTE : THE SHORTAGE TO AP290A AT ATMORE ALABAMA WILL BE ADDRESSED UTILIZING SECTION 73.215 REGULATIONS. SEE EXHIBIT # 4.

+ NOTE : THESE APPLICATIONS WERE FILED AFTER THE WINDOW HAD CLOSED AT CHATOM. ALABAMA AND ARE THEREFORE NOT CONSIDERED AS SHORTSPACED.

EXHIBIT #4A
AMEND BPH-891228MT
BENCHMARK COMM. CORP.
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